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February 16, 2021

Via ECF

The Honorable Mary Kay Vyskocil,
United States District Judge,
United States District Court,
500 Pearl Street, Room 2230,
New York, NY 10007.

Re: CFTC v. HDR Global Trading Ltd. et al., No. 20-cv-8132
(S.D.N.Y.)

Dear Judge Vyskocil:

On behalf of our clients, Defendants HDR Global Trading Limited, 100x Holdings Limited, ABS Global Trading Limited, Shine Effort Inc Limited, and HDR Global Services (Bermuda) Limited (collectively, “Corporate Defendants”), we write in response to the U.S. Department of Justice’s letter dated February 10, 2021 (ECF No. 40, “Letter”) and pursuant to your Honor’s February 11, 2021 docket order (ECF No. 41). The Department’s Letter requested a stay on discovery in the above-captioned matter and stated that Corporate Defendants “intend to take no position on the Government’s stay request.” Letter at 3.

We confirm that the Corporate Defendants take no position on a discovery stay in this case at this time. The Corporate Defendants have joined a stipulation to briefly extend the time by which they and other defendants must move against, answer, or otherwise respond to the Complaint until March 29, 2021. (ECF No. 38.) The Corporate Defendants also note that the Department’s Letter states that the discovery stay requested by the Department will not prejudice the Corporate Defendants because, among other reasons, the Department believes its criminal case “will be resolved expeditiously.” Letter at 3. The Corporate Defendants respectfully request that the Court consider that the Corporate Defendants continue to operate active business enterprises that are prejudiced by the pending litigation looming over them. The Corporate Defendants therefore have strong interests in expeditiously resolving all claims against them.

The Honorable Mary Kay Vyskocil

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Respectfully,

/s/ Kathleen S. McArthur

Kathleen S. McArthur

cc: Counsel of Record (via ECF)